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COURT OF CRIMINAL APPEALS
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NO. PD-0556-20

IN THE TEXAS COURT OF CRIMINAL APPEALS

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COURT OF CRIMINAL APPEALS
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PHI VAN DO
Respondent (Appellant in the Court of Appeals)
v.
THE STATE OF TEXAS
Petitioner (Appellee in the Court of Appeals)

On Review from No. 14-18-00600-CR
in which the Fourteenth District Court of Appeals
considered Cause Number 2130699
from County Criminal Court at Law No. 10
Harris County, Texas
Hon. Dan Spjut, Judge Presiding

BRIEF FOR RESPONDENT

ORAL ARGUMENT ORDERED

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STATEMENT OF THE CASE

Mr. Do agrees with the State's Statement of the Case.

STATEMENT REGARDING ORAL ARGUMENT

This Court has directed the parties to participate in oral argument.

GROUNDS FOR REVIEW

The State advances the following three grounds for review:

> Ground One: The Fourteenth Court erred by applying the constitutional harm standard to unobjected-to charge error.
>
> Ground Two: Alternatively, the Fourteenth Court erred by concluding that a punishment-phase objection preserved error in the guilt-phase charge.
>
> Ground Three: The Fourteenth Court erred by finding reversible harm even though the error concerned an uncontested matter established by objective facts.

All three of these grounds for review are premised on the idea there was jury-charge error in this case. Indeed, the Fourteenth Court of Appeals found there to have been error in the jury charge. Mr. Do believes the Court of Appeals erred in finding jury-charge error. Accordingly, Mr. Do's focus in this case is not on the three grounds advanced by the State. Instead, his focus is on the threshold question of whether there was any jury-charge error in the first place. This Court granted the State's petition for discretionary review to examine the State's questions surrounding supposed jury-charge error. In light of the fact that there is no jury-charge error here, the State's petition may have been improvidently granted.[1]

[1] *See* Tex. R. App. P. 69.3 which is entitled "Improvident Grant of Review" ("If, after granting discretionary review, five judges are of the opinion that discretionary review should not have been granted, the case will be dismissed.").

STATEMENT OF FACTS

The State's "Statement of Facts" is quite short.[2] Mr. Do does not disagree with anything in the State's Statement of Facts.

The portion of the State's Brief labeled as "Procedural Background" is much lengthier. This section of the State's Brief contains additional facts that are important to the resolution of this appeal. Mr. Do agrees with the State's rendition of the facts in this portion of the State's Brief. There do not appear to be any factual misstatements. However, this portion of the State's Brief also contains some legal argument.[3] Mr. Do does not necessarily agree with these legal arguments.

[2] *See* State's Brief on Discretionary Review at 8.
[3] *See e.g.,* State's Brief on Discretionary Review at 14 n.2.

SUMMARY OF THE ARGUMENT

There was no error in the jury charge. The Fourteenth Court of Appeals, however, found there was jury-charge error. This conclusion led the Court of Appeals into a detailed examination of the appropriate standard for determining whether the error was harmful. But because there was no jury-charge error in the first place, this examination was wholly unnecessary.

The fact that there was no error in the jury charge does not mean there was no error in the trial court's handling of the case. The trial court committed a major error in the trial's punishment phase. The trial court erred by treating an element of an offense as a fact that could be used to enhance punishment.

The offense in question was Class-A-misdemeanor DWI. This offense consists of the same elements as Class-B-misdemeanor DWI[4] plus one additional element. The additional element is set out in Section 49.04(d) of the Penal Code:

> If it is shown on the trial of an offense under this section that an analysis of a specimen of the person's blood, breath, or urine showed an alcohol concentration level of 0.15 or more at the time the analysis was performed, the offense is a Class A misdemeanor.

This additional element must be proved at the guilt-innocence stage of trial. But in this case, the jury was never asked to determine whether this element existed. Rather,

[4] The elements of Class-B-misdemeanor DWI are listed in Section 49.04(a) of the Penal Code. That statute says "[a] person commits an offense if the person is intoxicated while operating a motor vehicle in a public place."

the jury was charged only with finding whether the defendant (Mr. Phi Van Do) had committed Class-B-misdemeanor DWI. Not until the trial's punishment phase did the State ask for a finding that Mr. Do's alcohol-concentration level was 0.15 or more. This was too late. In fact, the jury had been released because Mr. Do had chosen to have the trial court decide his punishment. Over Mr. Do's objection, the trial court made a finding that Mr. Do's alcohol-concentration level was 0.15 or more. The trial court then proceeded to find Mr. Do guilty of Class-A-misdemeanor DWI. This was error.

ARGUMENT

ONE: There was no error in the jury charge.

The State's three grounds for review are all premised on the idea that the jury charge was erroneous. Mr. Do emphatically rejects this notion. There was no jury-charge error here.

The jury charge was entirely proper. It charged the offense of Class-B-misdemeanor DWI.[5] This was precisely the offense the jury should have been charged with deciding. An explanation is in order.

The charging instrument in this case was an information. The information contained two paragraphs:

> Comes now the undersigned district attorney of Harris County, Texas on behalf of the State of Texas and presents in and to the County Criminal Court at Law No._____ of Harris County, Texas, **PHI VAN DO,** hereafter styled the defendant, heretofore on or about **JANUARY 9, 2017,** did then and there unlawfully operate a motor vehicle in a public place while intoxicated.
>
> It is further alleged that, at [sic] an analysis of a specimen of the defendant's BREATH showed an alcohol concentration level of at least 0.15 at the time the analysis was performed.[6]

The first paragraph charged Mr. Do with committing the offense of Class-B-misdemeanor DWI. The second paragraph added an additional allegation that turns a

[5] The colloquial term DWI stands for "driving while intoxicated."
[6] C.R. at 8.

Class-B-misdemeanor DWI into a Class-A-misdemeanor DWI.[7] So the information charged Mr. Do with the offense of Class-A-misdemeanor DWI. But this was not the offense set out in the jury charge. The jury charge asked the jury to decide whether Mr. Do had committed Class-B-misdemeanor DWI – not Class-A-misdemeanor DWI.[8] This was entirely the correct charge. This is because the State abandoned the Class-A-

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[7] The Court of Appeals' explained this concept well:

> Section 49.04(a) of the Penal Code provides: "A person commits an offense if the person is intoxicated while operating a motor vehicle in a public place." Tex. Penal Code § 49.04(a). A DWI offense is ordinarily a Class B misdemeanor. *Id.* § 49.04(b). However, section 49.04(d) provides: "If it is shown on the trial of an offense under this section that an analysis of a specimen of the person's blood, breath, or urine showed an alcohol concentration level of 0.15 or more at the time the analysis was performed, the offense is a Class A misdemeanor." *Id.* § 49.04(d).

Do v. State, No. 14-18-00600-CR, 2020 WL 1619995 at *4 (Tex. App.—Houston [14th Dist.] April 2, 2020, pet. granted).

[8] In pertinent part, the jury charge said:

> You must determine whether the State has proved three elements beyond a reasonable doubt which are as follows:
>
> 1. The defendant PHI VAN DO, operated a motor vehicle in Harris County, Texas, on or about JANUARY 9th, 2017;
> 2. in a public place;
> 3. while intoxicated by not having the normal use of his mental faculties due to the introduction of alcohol; by not having the normal use of his physical faculties due to the introduction of alcohol; or by having a [sic] alcohol concentration of .08 or higher.
>
> You must all agree on elements 1, 2, and 3 listed above but you do not have to agree on the method of intoxication listed above.
>
> If you all agree the State has failed to prove, beyond a reasonable doubt, each of the three elements 1, 2, and 3 listed above, you must find the defendant "not guilty."
>
> If you all agree the State has proved, beyond a reasonable doubt, each of the three elements listed above then you must find the defendant guilty.

3 R.R. at 77; *see also* C.R. at 86-92.

misdemeanor DWI offense during trial. An account of this abandonment is set out below.

After the six members of the petit jury were sworn,[9] the trial judge gave the jurors various instructions.[10] The judge then invited the prosecutor to present the information by reading it aloud to the jury.[11] The prosecutor then read only the first paragraph of the information.[12] She did not read the second paragraph which alleged that Mr. Do's alcohol concentration level was at least 0.15.[13] The judge then asked Mr. Do how he would plead to the charge.[14] Mr. Do proceeded to plead not guilty.[15] This sequence of events is of great consequence.

The prosecutor's reading of the charging instrument is required by Article 36.01(a) of the Code of Criminal Procedure.[16] It is the first of several chronological events in a jury trial.[17] The second chronological event is the defendant's plea of not guilty.[18] The prosecutor's reading of the charging instrument and the defendant's entry of a not-guilty plea at a trial's beginning is colloquially called an "arraignment."[19] But

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[9] 2 R.R. at 80.
[10] 2 R.R. at 81-83.
[11] 2 R.R. at 83.
[12] 2 R.R. at 83.
[13] 2 R.R. at 83.
[14] 2 R.R. at 83.
[15] 12R.R. at 84.
[16] Tex. Code Crim. Proc. art. 36.01(a). *See Warren v. State,* 693 S.W.2d 414, 415 (Tex. Crim. App. 1985).
[17] Tex. Code Crim. Proc. art. 36.01(a)(1).
[18] Tex. Code Crim. Proc. art. 36.01(a)(2).
[19] *See Hinojosa v. State,* 788 S.W.2d 594, 599 (Tex. App.—Corpus Christi 1990, pet. ref'd).

this is not legally correct terminology.[20] The reading of the indictment is simply the first step in a jury trial.[21] The defendant's entry of a plea is the second step.[22]

Regardless of the nomenclature, these first two steps are significant. This Court has explained the reason for requiring the State to read the charging instrument before the jury. It is "to inform the accused of the charges against him and to inform the jury of the precise terms of the particular charge against the accused."[23] In fact, "[w]ithout the reading of the indictment and the entering of a plea, no issue is joined on which to try."[24]

The fact that the prosecutor did not read the second paragraph of the information to the jury in this case is of major importance. By not reading the second paragraph, the prosecutor did not give Mr. Do notice that he was still being charged with Class-A-misdemeanor DWI. Thus, no issue between the State and Mr. Do was

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[20] *See id.*

[21] *See id.* ("Appellant confuses the arraignment process with the first step in a criminal trial"); *see also Posey v. State,* 840 S.W.2d 34, 36 (Tex. App.—Dallas 1992, pet. ref'd) (contrasting an arraignment with the first step in a criminal trial).

[22] *See* Tex. Code Crim. Proc. art. 36.01(a)(2).

[23] *Warren v. State,* 693 S.W.2d at 425. *See also Hinojosa v. State,* 788 S.W.2d at 599 ("The purpose of reading the accusation before the jury is to inform both the accused and the jury of the charge being brought against the accused."); *Lara v. Stafford,* 740 S.W.2d 823, 828-29 (Tex. App.—Houston [1st Dist.] 1987, pet. ref'd) (one purpose of reading the indictment to the jury at the beginning of the prosecution is "to inform them in precise terms of the particular charge laid against the defendant on trial").

[24] *Warren v. State,* 693 S.W.2d at 415 (emphasis added). The quotation speaks of an "indictment," but the statement is equally true and accurate when the charging instrument is an information.

"joined" as to a Class-A-misdemeanor DWI charge.[25] The only "joined" issue between the State and Mr. Do was the Class-B-misdemeanor DWI charge. In a jury trial, it is the reading of the charging instrument and the plea thereto that causes an issue to be joined. It is not the charging instrument itself. This Court has said:

> The indictment is the basis for the prosecution. Among other things, its office is to inform the appellant of the charge laid against him, and one of the purposes of the requirement that it shall be read to the jury at the beginning of the prosecution is to inform them in precise terms of the particular charge laid against the defendant on trial. His plea thereto makes the issue.[26]

By not reading the second paragraph, the State effectively abandoned that part of the information charging Mr. Do with Class-A-misdemeanor DWI.[27] The only charge brought against Mr. Do was the offense of Class-B-misdemeanor DWI. Accordingly, the trial court acted properly in charging the jury with determining whether the elements of Class-B-misdemeanor DWI had been proved. It would have been an error to also charge the jury with determining whether Mr. Do had an alcohol-concentration level of 0.15 or more. That part of the information had been abandoned.

The State made the following argument in its brief in the Court of Appeals:

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[25] *See* text accompanying preceding footnote.
[26] *Peltier v. State,* 626 S.W.2d 30, 31 (Tex. Crim. App. 1981).
[27] "[T]he State can abandon an element of the charged offense without prior notice and proceed to prosecute a lesser-included offense." *Nikes v. State,* 555 S.W.3d 562, 576 n.8 (Tex. Crim. App. 2018) (Yeary, J., dissenting) (directly quoting from *Grey v. State,* 298 S.W.3d 644, 650 (Tex. Crim. App. 2009)).

> The error in this case was not the State's failure to prove its allegation, but rather the trial court's failure to submit all the elements of the charged offense to the jury during the guilt phase.[28]

This assertion is wrong. The Court of Appeals erred in accepting this argument and finding error in the jury charge.[29]

[28] State's Appellate Brief at 12.

[29] As the State correctly notes in its brief, the Court of Appeals agreed with the State that there was error in the jury charge. *See* State's Brief on Discretionary Review at 13.

TWO: The State's argument in this Court is premised on the existence of jury-charge error.

The State argues three main points in this Court. All of the points depend on an initial determination that the trial court's jury charge was erroneous.

First, the State contends Mr. Do did not preserve the jury-charge error.[30] Second, the State asserts the Court of Appeals used the wrong standard in evaluating harm.[31] Third, the State argues the Court of Appeals erred in finding harm.[32]

These three main points may all be academically interesting. But they are not germane to this appeal. Consequently, Mr. Do declines to engage in an argument (of any depth) with the State on any of these issues.

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[30] *See* State's Brief on Discretionary Review at 11 ("the problem in this case was . . . the failure to submit the .15 element to the jury during the guilt phase") and at 14-15 ("appellant did not object to the omission of the element"). *See also* State's Brief on Discretionary Review at 18-20 ("Second Ground for Review: Alternatively, the Fourteenth Court erred by concluding that a punishment-phase objection preserved error in the guilt-phase charge").

[31] *See* State's Brief on Discretionary Review at 15-18 ("First Ground for Review – The Fourteenth Court erred by applying the constitutional harm standard by applying the constitutional harm standard to unobjected-to charge error").

[32] *See* State's Brief for Discretionary Review at 21-23 ("Third Ground for Review – The Fourteenth Court erred by finding reversible harm even though the error concerned an uncontested matter established by objective facts").

As to the jury-charge error that supposedly exists, Mr. Do obviously did not preserve error. There was nothing in the jury charge to which Mr. Do needed to object. There was no error that needed to be preserved.

As to whether the Court of Appeals employed the correct standard in evaluating harm, Mr. Do simply says this question is inapposite. The first question for an appellate court in analyzing a jury-charge issue is whether the charge contains error.[33] Only if the jury charge contains error should an appellate court analyze that error for harm.[34] Again, Mr. Do's position is that there was no error to preserve. Thus, there is no point in discussing whether the error was harmful (including the proper standard for determining harm).

[33] *Ngo v. State,* 175 S.W.3d 738, 745 (Tex. Crim. App. 2005).
[34] *See id.*

THREE: The absence of jury-charge error does not mean there was no error.

As explained above, there was no error in the jury charge in this case. But although there was no jury-charge error, the trial court did commit a major error. And there is no question this major error was properly preserved.

The error occurred not during the guilt-innocence phase of trial, but rather during the trial's punishment phase. A brief rendition of pertinent facts is warranted here.

As mentioned earlier, the jury was charged with finding whether Mr. Do committed the offense of Class-B-misdemeanor DWI.[35] The jury found Mr. Do guilty.[36] The trial court then dismissed the jury.[37]

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[35] *See* Footnote 8. On the verdict form, the jury was asked only to find whether Mr. Do was guilty of DWI. C.R. at 93. The jury was not asked to determine whether Mr. Do had an alcohol concentration level or 0.15 or more. C.R. at 93.

[36] C.R. at 93, 94; 3 R.R. at 90-91.

[37] *Id.* Mr. Do had opted to have the trial court assess punishment. *See* 3 R.R. at 31 (trial court told jurors Mr. Do had elected to go to the Court for punishment so they would only be deciding guilt or innocence).

Four days later, the trial court conducted a punishment hearing.[38] The following interaction took place between the trial judge, the prosecutor (Mr. Cleggett) and the defense attorney (Mr. Hopmann):

> THE COURT: All right. We're here for sentencing. A jury trial was conducted in this court which began on June 14, 2018 and concluded on June 15th, 2018 at which time the jury returned a verdict of guilty. So, we're here for sentencing. Anything from the State?
> MR. CLEGGETT: At this time, the State would like to allege – further allege the .15 allegation. So it is fair to allege that an analysis of a specimen of the defendant's breath showed an alcohol concentration level of at least 0.15 at the time the analysis was performed.
>
> THE COURT: Any objection from the defense?
>
> MR. HOPMAN: Your Honor, that element was not presented to the jury for their consideration as part of deliberations. We would object to the enhanced element at this time. They tried it as a loss of use case.
>
> THE COURT: Any response?
>
> MR. CLEGGETT: The response from the State is that it's a punishment element. It wasn't a [sic] element of the actual offense. We did have evidence that the analysis of the breath was above a .15. We tried it as – all three were able to prove intoxication and the BAC actually came out at trial.
>
> THE COURT: The objection is overruled. The Court finds the enhancement to be true.[39]

As the foregoing exchange shows, the prosecutor thought the question of whether Mr. Do's alcohol-concentration level was at least 0.15 was a punishment issue.

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[38] The guilt/innocence portion of the trial was conducted on June 14th and 15th of 2018. *See* 1 R.R. at 3-4. The punishment phase of the trial took place on June 19, 2018. *See* 1 R.R. at 5.
[39] 4 R.R. at 4-5.

And the trial judge agreed that an affirmative answer called for a punishment enhancement. This was an obvious error. The question of whether a defendant's alcohol-concentration level is at least 0.15 is an element of Class-A-misdemeanor DWI.[40] And that element is to be proved at the guilt-innocence stage of trial.[41] The State does not disagree.[42]

The trial judge should have sustained defense counsel's objection and not considered the question of whether Mr. Do's alcohol-concentration level was 0.15 or more. The judge's overruling of defense counsel's objection led to the further problem of convicting Mr. Do of Class-A-misdemeanor DWI. And that led to yet another problem – namely, the sentencing of Mr. Do in accord with the punishment for a Class-A misdemeanor. The judge sentenced Mr. Do to one year in jail.[43] While this is an appropriate sentence for a Class-A misdemeanor, it is not appropriate for a Class-B misdemeanor.[44]

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[40] *Navarro v. State,* 469 S.W.3d 687, 696 (Tex. App.—Houston [14th Dist.] 2015, pet. ref'd).
[41] *Id.*
[42] *See* State's Appellate Brief at 11 ("When a defendant is charged with the Class A misdemeanor of DWI with an alcohol concentration of .15 or greater, the issue of whether the defendant's alcohol concentration was .15 or greater is an essential element of the offense that must be proved to the jury at the guilt phase of trial.").
[43] 4 R.R. at 6.
[44] *See* Tex. Penal Code § 12.21 (maximum jail confinement of one year for a Class-A misdemeanor) and § 12.22 (maximum jail confinement of 180 days for a Class B misdemeanor).

Class-A-misdemeanor DWI is an entirely different offense than Class-B-misdemeanor DWI. The offense of Class-A-misdemeanor DWI has an additional element that Class-B-misdemeanor DWI does not have. That additional element is that the defendant's alcohol-concentration level was 0.15 or more. As announced in *Castellanos v. State,* this additional element must be proved at the guilt-innocence stage of trial.[45] That did not happen here. And as the law shows, this is a fundamental problem.

"[N]o person may be convicted of an offense unless each element of the offense is proven beyond a reasonable doubt."[46] This sentence is a direct recitation of the pertinent text of Article 38.03 of the Code of Criminal Procedure. And the sentence is merely a restatement of the same principle recognized by the U.S. Supreme Court in *In re Winship*:

> [W]e explicitly hold that the Due Process Cause protects the accused against conviction except upon proof beyond a reasonable doubt of every fact necessary to constitute the crime with which he is charged.[47]

The Supreme Court recently reiterated this principle in *Hurst v. Florida*:

> The Sixth Amendment provides: "In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury . . . ." This right, in conjunction with the Due Process Clause, requires

[45] *Castellanos v. State,* 533 S.W.3d 414, 418-19 (Tex. App.—Corpus Christi 2016, pet. ref'd).
[46] Tex. Code Crim. Proc. art. 38.03.
[47] *In re Winship,* 397 S.W.3d 358, 364, 90 S.Ct. 1068, 1073, 25 L.Ed.2d 368 (1970) (emphasis added).

> that each element of a crime be proved to a jury beyond a reasonable doubt.[48]

Plainly and simply, the problem in this case is the violation of Article 38.03 and the constitutional violations recognized in *Winship* and *Hurst*. Mr Do's conviction for Class-A-misdemeanor DWI cannot stand because each element of the offense was not proven. Period. No harm analysis is required.

An explanation as to why no harm analysis is required may be helpful here. When evidence is insufficient to support a jury's finding of an essential element of the charged offense, a conviction for that offense cannot stand.[49] As recognized by this Court, there are two possible outcomes when evidence is insufficient to support a conviction for a particular offense. First, the defendant can be acquitted. Second, in appropriate circumstances, the judgment maybe reformed to reflect a verdict of guilty on a lesser-included offense:

> In *Bowen,* we held that a court of appeals, upon finding the evidence supporting a conviction to be legally insufficient, is not necessarily limited to ordering an acquittal, but may instead reform the judgment to reflect a

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[48] *Hurst v. Florida,* 577 U.S. 92, 97, 136 S.Ct. 616, 621, 193 L.Ed.2d 504 (2016) (emphasis added) (citing *Alleyne v. United States,* 570 U.S. 99, 104, 133 S.Ct. 2151, 2156, 186 L.Ed.2d 314 (2013)).

[49] *See Gross v. State,* 380 S.W.3d 181, 183 (Tex. Crim. App. 2012) (affirming Court of Appeals' decision to render judgment of acquittal because evidence was insufficient to support murder conviction). *See also United States v. Martin Linen Supply Co.,* 430 U.S. 564, 572, 97 S.Ct. 1349, 1355, 51 L.Ed.2d 642 (1977) (government failed to prove material allegations – *i.e.,* evidence was insufficient to sustain a conviction and the defendant was found not guilty); *State v. Moreno,* 294 S.W.3d 594, 599 (Tex. Crim. App. 2009) (describing the judge in *Martin Linen Supply* as having commented "that the Government failed to prove the elements of the offense").

> verdict of guilty on a lesser-included offense—even when no lesser-included instruction was given at trial.[50]

There is, however, no option to conduct a harm analysis and uphold the conviction for the offense for which there is insufficient evidence.

In the case at bar, the evidence was not insufficient to support a finding that Mr. Do's alcohol-concentration level was 0.15 or higher. Rather, there was simply no finding at all. But the result is the same as if the evidence were insufficient. All of the elements of Class-A-misdemeanor DWI were not proved.[51] And "no person may be convicted of an offense unless each element of the offense is proved beyond a reasonable doubt."[52]

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[50] *Thornton v. State,* 425 S.W.3d 289, 294 (Tex. Crim. App. 2014) (citing *Bowen v. State,* 374 S.W.3d 427 (Tex. Crim. App. 2012)).

[51] This, of course, is a problem because "the State must prove each element of an offense beyond a reasonable doubt." *McQuarrie v. State,* 380 S.W.3d 145, 154 (Tex. Crim. App. 2012).

[52] Tex. Code Crim. Proc. art. 38.03.

PRAYER

Mr. Do respectfully prays that this Court affirm the decision of the Fourteenth Court of Appeals.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on November 24, 2020, I provided this brief to the Harris County District Attorney via the EFILETEXAS.gov e-filing system. This service is required by Texas Rule of Appellate Procedure 9.5.

Additionally, I certify that on November 24, 2020, I provided this brief to the State Prosecuting Attorney via the EFILETEXAS.gov e-filing system. This service is required by Texas Rules of Appellate Procedure 68.11 and 70.3.

/s/ Ted Wood
TED WOOD
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Attorney for Respondent

CERTIFICATE OF COMPLIANCE

As required by Texas Rule of Appellate Procedure 9.4(i)(3), I certify that this brief contains 4,190 words. This word-count is calculated by the Microsoft Word program used to prepare this brief. The word-count does not include those portions of the brief exempted from the word-count requirement under Texas Rule of Appellate Procedure 9.4(i)(1). The number of words permitted for this type of computer-generated brief (a brief in response in an appellate court) is 15,000. Tex. R. App. P. 9.4(i)(2)(B).

/s/ Ted Wood

TED WOOD
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